



Pension Benefit
Guaranty Corporation

Equity Action Plan

Fiscal Year 2022

Submitted January 20, 2022

(1) **Executive summary**

Agency name and mission: PBGC’s mission is to protect the retirement incomes of over 34 million American workers in private sector defined benefit pension plans, which is valued over \$3 trillion. PBGC was created by the Employee Retirement Income Security Act of 1974 to encourage the continuation and maintenance of private sector defined benefit pension plans, provide timely and uninterrupted payment of pension benefits, and keep pension insurance premiums at a minimum. PBGC’s Single-Employer Program is financed by insurance premiums, investment income, and assets and recoveries from failed single-employer plans. The Multiemployer Program is financed by insurance premiums, and the Special Financial Assistance Program for financially troubled multiemployer plans is financed by general taxpayer money.

(2) **Summary of early accomplishments**

Please highlight any equity-related achievements or successes (e.g., innovative stakeholder engagement, notable changes in policies or operations, new partnerships, etc.) since EO 13985 was released on January 20, 2021.

a. **Improving Customer Outreach and Communications:**

Assessed opportunities to reach out to retirees and pension participants with disabilities, limited English proficiency, and limited access to internet via multiple communication methods (e.g., internet, phone, and mailings) to ensure they are informed of and can access benefits to which they are entitled by law. Since the 200-day assessment PBGC customers are a 30 percent faster web page loading due to website upgrades. The upgrades also provide an increase in section 508 compliance accessibility and mobile responsiveness, along with easier navigation features and clearer banner messages. With these updates, PBGC.gov’s content is easier to interact with, than before. Customer surveys since August 2021 suggest a slight improvement in customer satisfaction with My Pension Benefit Access (MyPBA), an online tool where participants can handle common pension-related transactions (e.g., applying for pension benefits and designating a beneficiary, etc.). This is attributed to the Office of Benefits Administration (OBA), which has begun providing hands-on one-on-one assistance to customers. Based on the daily queue reports of the grade of customer service provided and the decrease call abandonment rates has improved.

b. **Educating At-Risk Older Retirees and Participants:**

The population we serve can be especially vulnerable to fraud because they are often seen as easy targets. OBA is reinventing the retiree newsletter. Going forward content will also be displayed via the webpage on PBGC.gov. We are considering incorporating a static reminder to protect Personally Identifiable Information (PII). This might include a quick list of helpful tips such as, don’t divulge Social Security

number, bank accounts, etc. to cold callers. OBA is in the early stages of designing the webpage.

c. Expanding Small and Disadvantaged Business Utilization:

The impacted underserved communities are small and disadvantaged small businesses including minority-, women-, and veteran-owned small businesses. PBGC is focused on engaging internal and external stakeholders to identify and maximize existing authorities and opportunities for small businesses focusing on two primary areas: Office of Small & Disadvantaged Business Utilization (OSDBU) and Smaller Asset Manager Program.

PBGC attends Office of Small & Disadvantaged Business Utilization (OSDBU) monthly meetings and is working on establishing small business goals. PBGC continues networking with other OSDBUs to leverage the tools that we can make available to others for market research and considerations for future small and Disadvantaged Business contracts. In efforts to express our goals, schedule, and solicit feedback about procurement we are planning an Industry Day for 2022 targeted at small and disadvantaged businesses.

The Smaller Asset Manager Program initiative uses institutional investment management firms to invest its assets. PBGC has discussed this effort with its Board and its Advisory Committee and has successfully piloted this program. See Section 3(A)(e).

d. Cultivating Relationships with Community Colleges

New initiative identified since last submission to OMB/DPC. See Section 3(A)(d).

(3) Equity action plan

*Please clearly identify **three to five** actions that your agency plans to undertake and list them **in order of priority**; provide evidence-based reasoning for selection; and outline high-level elements of implementation. (Actions should address the institutional resources available to offices responsible for advancing **civil rights** pursuant to Section 5(d) and **procurement and contracting** pursuant to Section 7(a) of EO 13985 but may also focus on other significant priorities identified by the agency regardless of whether they were included in the agency's equity assessment.)*

For **each action**, please include:

A. Barrier to Equitable Outcome(s)

- Describe the barrier you are trying to address.

a. Improving Customer Outreach and Communications:

PBGC's customers represent different comfort levels with using electronic messaging (emails and online services) and have varying access to technology. PBGC would like to leverage lower cost electronic communication methods but will work to implement stated customer communication preferences.

b. Educating At-Risk Older Retirees and Participants:

PBGC serves a vulnerable population of retirees and pension plan participants. With an overall increase in victimization of older adults by friends, family, and scam calls, our participants are potentially left susceptible to fraud and abuse.

c. Expanding Small and Disadvantaged Business Utilization:

Most of our contracting opportunities are in specialized areas, such as: investment, actuarial science, and benefits administration that may not attract small or disadvantaged businesses. Since our 200-day assessment we have awarded an HR services contract to a disabled-veteran-owned small business. As we begin to plan the 2022 Industry Day, we will target small and disadvantaged businesses for IT services and possibly other areas. As part of the Smaller Asset Manager Program, PBGC has sought ways to reduce competition barriers faced by smaller firms while maintaining rigorous investment risk and control standards.

d. Cultivating Relationships with Community Colleges

We normally recruit from four-year institutions rather than community colleges for our Pathways Internship Program because these schools provide specialized degree programs which a majority of departments seek specialized experience for the college students hired. In order to reach more diverse student populations, PBGC will develop relationships with community colleges in order to facilitate a pipeline of prospective applicants (many of whom are from underserved communities) for the Pathways Internship Program.

- *Specify the program, policy, or regulation that contributes to this barrier.*

a. Improving Customer Outreach and Communications:

PBGC has determined that some customers are unable to create a MyPBA account using login.gov because the requirements for online identity authentication are very rigorous. This affects foreign residents, customers without a driver license, and those without a mobile phone registered in their name.

b. Educating At-Risk Older Retirees and Participants:

PBGC is developing content for its MyPBA home page and Workers & Retirees pages to address fraud and keeping PII safe.

c. Expanding Small and Disadvantaged Business Utilization:

PBGC has not identified any policy or regulation that contributes to barriers in awarding PBGC contracts to small and disadvantaged businesses. However, we continue to look for ways to create more equitable and inclusive business opportunities, including establishing a Procurement Planning Manager position that will be responsible for championing discussions and strategies to support PBGC's Office of Small and Disadvantaged Business Utilization.

d. Cultivating Relationships with Community Colleges

Typically, we have specialized positions in legal, auditing or actuarial internships that lend themselves to a four-year colleges and post-secondary graduate programs. Often, community colleges may not offer the specialized and advanced degree programs required for the position(s).

o *Indicate which populations are most impacted by this barrier.*

a. Improving Customer Outreach and Communications:

Those with limited technology access or experience and those without current state driver's licenses, such as foreign residents and non-drivers.

b. Educating At-Risk Older Retirees and Participants:

The older population of retirees and pension plan participants.

c. Expanding Small and Disadvantaged Business Utilization:

The impacted underserved communities are minority-, women-, and veteran-owned businesses, and other small-business programs.

d. Cultivating Relationships with Community Colleges

Those most affected by this barrier are students at community colleges. Statistically, these students tend to be low-income and of minority groups.

o *List the evidence indicating that this barrier meaningfully impacts full and equal participation.*

a. Improving Customer Outreach and Communications:

We have reviewed extensive documentation from customer surveys and contact center data that includes, number of calls received, feedback from those calls, communication

preferences, and language preferences. After reviewing the customer feedback, it is evident that this area can be improved, to better serve our retirees and participants.

b. Educating At-Risk Older Retirees and Participants:

Given that PBGC serves mostly older retirees and participants, and vulnerable adults frequently victimized by friends and family, the need exists to educate and protect against various fraudulent methods and how to keep their pensions safe. Educating our customers about common ways their personally identifiable information (PII) can be stolen, will decrease the chances of theft. Research shows an uneducated consumer base can lead to fraudulent activities. Because seniors are not as aware of fraud, they are less likely to report fraud due to the following reasons: they may not know how to report a scam, they may not realize that they have been scammed, and they may be embarrassed.

c. Expanding Small and Disadvantaged Business Utilization:

In FY 2020, PBGC spent a little over \$53 million on minority-, women-, and veteran-owned businesses. Increasing the funding that is awarded to these small and disadvantaged businesses will have a greater lasting economic benefit for these communities.

As part of the Smaller Asset Manager Program, PBGC has sought ways to reduce competition barriers faced by smaller firms while maintaining rigorous investment risk and control standards and has successfully initiated a pilot program which was approved by its Board and its Advisory Committee.

d. Cultivating Relationships with Community Colleges

Thirty-three percent of students at community colleges received a Federal Pell Grant for “exceptional financial need.” This includes 55 percent of students whose annual household income was less than \$30,000. Additionally, these students are twice as likely to work a full-time job (which may render them unavailable for an internship) than those at traditional public or private institutions. Fifty-five percent of these students are female and in recent years, 38 percent of students at community colleges were part of the Black and Hispanic communities. The highest increase in attendance in community college is Hispanic enrollment which is up by 10 percent since 2008.

B. Action and Intended Impact on Barrier

- *Describe the actions the agency will take to eliminate/reduce the barrier?*

a. Improving Customer Outreach and Communications:

We are working to implement a process to better match customers' communication preferences (written vs. electronic) with the type of communication they receive.

b. Educating At-Risk Older Retirees and Participants:

Static reminders to educate and protect personally identifiable information (PII), which can include helpful tips to not divulge Social Security numbers, passwords, bank accounts, and other PII. Expanding our communications via regular mail, perhaps by reinstating the PBGC newsletter; enhancing the contact center experience by reducing hold times and dropped calls; making the MyPBA web-based system more user-friendly for an older population; and providing more information about PBGC and how to communicate with us. Improvements may be tracked using our existing customer survey and feedback system.

c. Expanding Small and Disadvantaged Business Utilization:

PBGC will continue to track the awareness of small and disadvantaged businesses. This is accomplished from hosting Industry Days and establishing an Office of Small and Disadvantaged Business Utilization (OSDBU). The OSDBU is headed by a manager who is responsible for championing discussions and strategies to enhance the inclusion and performance of small and disadvantaged businesses across PBGC's procurement efforts. We will continue to monitor how our small and disadvantaged business performance aligns with our small and disadvantaged business goals, and if we have met our performance objectives.

d. Cultivating Relationships with Community Colleges

PBGC will develop relationships with community colleges to facilitate a pipeline of prospective applicants for the Pathways Internship Program.

o *Why did you prioritize these actions?*

PBGC leadership identified four actions (improve customer outreach and communication, educate at-risk older retirees and participants, expanding small and disadvantaged business utilization and cultivating relationships with community colleges) to be our major obstacles.

- *Indicate how the actions are expected to result in reducing or eliminating the barrier to equitable outcomes. If not identified above, please indicate what evidence supports this connection.*

- a. Improving Customer Outreach and Communications:

PBGC can communicate with customers in most common languages. By educating and transacting with our participants in their native languages, when necessary, we reduce the potential of misunderstanding and increase their ability to successfully interact with our agency.

- b. Educating At-Risk Older Retirees and Participants:

By promoting the message to protect PII via a static message on the website and via regular communication PBGC believes we will reduce the potential for fraud. These communication efforts will help PBGC participant better identify potential scams and seek effective assistance if they believe they have been targeted.

- c. Expanding Small and Disadvantaged Business Utilization:

PBGC will continue to promote small business opportunities from hosting Small-Business Industry Days. We will continue to monitor how our small and disadvantaged business performance aligns with our small and disadvantaged business goals and if we have met our performance objectives.

- d. Cultivating Relationships with Community Colleges

PBGC will assess the effectiveness of this initiative by identifying the number of community colleges with whom we develop relationships during Fiscal Year 2022. After the first year, we will further assess how to encourage applicants from community colleges to apply to Pathways Internship Program vacancies.

C. Tracking Progress

- *Describe what factors you will use to determine whether the agency action(s) has eliminated or substantially reduced the barrier to equitable access identified above in the near- to mid-term (2-4 years out).*

- a. Improving Customer Outreach and Communications:

PBGC will continue to collect qualitative feedback from customer surveys regarding serviceability of MyPBA, customer call center, and other outward-facing customer channels. PBGC will also track the number of additional foreign languages services it provides.

- b. Educating At-Risk Older Retirees and Participants:

Establishment of fraud awareness representation on PBGC's website.
To better understand PBGC participant needs we are exploring gathering additional data about our customers to determine what improvements would provide the greatest positive impact.

c. Expanding Small and Disadvantaged Business Utilization:

PBGC will continue to track the awareness from hosting Industry Days. We will continue to monitor how our small and disadvantaged business performance aligns with our small and disadvantaged business goals and if we have met our performance objectives.

d. Cultivating Relationships with Community Colleges

After the second year, we will further assess how to encourage applicants from community colleges to apply to Pathways Internship Program vacancies.

- o *Indicate what success might ultimately look like in the long-term (5-8 years out).*

a. Improving Customer Outreach and Communications:

Customer satisfaction outcome-based metrics will illustrate a more robust user-friendly interface. Subsequently, customer surveys will provide feedback.

b. Educating At-Risk Older Retirees and Participants:

PBGC will receive fewer complaints concerning the older population and vulnerable adults falling prey to fraud and scams.

c. Expanding Small and Disadvantaged Business Utilization:

Continue to obtain and review relevant data on contracts awarded to small and Disadvantaged Businesses by meeting with internal and external stakeholders who impact this business community.

Increase the number of educational offerings provided to acquisition staff regarding small-business, such as small-business set-aside courses.

Expanded outreach efforts to the small business community through communication and outreach events such as our Industry Day(s) and monitor prime contractor performance regarding small-business plans by increasing an administrative oversight into contractor performance regarding FAR clause 52.219-8, Utilization of Small-Business Concerns. Awarding more small-business contracts will allow those

businesses to grow, empowering them to hire more employees and better serve their customers and communities.

d. Cultivating Relationships with Community Colleges

After 5 to 8 years have passed, we should have a diverse population of interns that represent a diverse workforce. We will continue to educate hiring officials to explore the benefits of hiring from a more diverse application pool.

D. Accountability

- *Describe how the agency will hold itself accountable to implementing this action. Consider potential internal and external mechanisms (e.g., aligning with the Agency Strategic Plan and/or other public-facing documents, embedding equity-related goals in performance plans, holding virtual town halls, etc.) and how and when the agency will communicate progress to stakeholders.*

The PBGC will hold itself accountable by aligning these equitable initiatives with the following: the agency’s future 2022 – 2026 Strategic Plan; PBGC’s website; the Annual Performance Report; customer satisfaction surveys; and OBA’s Daily Queue Reports for Statistics on Call Handling. PBGC’s leadership will communicate to employees on the agency’s equitable initiatives through departmental meetings and communications such as “State of Play” correspondences (Chief Management Officer agency updates) and the intranet. Finally, all data and information are gathered and presented to the PBGC Director and Executive Management Committee for their consideration and decisions regarding policy.